

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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Attorneys for plaintiffs

JANICE LEE, BON HYUB KOO, RYAN
JUN-MO KOO, HONG SEA LEE, and
YOON SOON LEE,

Plaintiffs,

v.

TMZ PRODUCTIONS INC., DAILY
NEWS L.P., JOSEPH STEPANSKY,
ERIK BADIA, CORKY
SIREMASZKO, DAVID HANDSCHUH,
SHOWBIZ NEWS,
THE KOREA TIMES, CHEON JI HUN,
UPTOWN MAGAZINE, NATALI
RIVERS, ROLLINGOUT, TERRY
SHROPSHIRE, DIRTY SPORTS,
CHURCH ILBO, YOUR DAILY MEDIA,
MAMO, ALL THINGS CRIME,
TIGERDROPPINGS, JOHN DOES and
JANE DOES 13-15,

Defendants.

15-CV-

Complaint with Jury Demand

Plaintiffs Janice Lee, Bon Hyub Koo, Ryan Jun-Mo Koo, Hong Sea Lee and Yoon Soon Lee for their complaint against the above-named defendants state:

PLAINTIFFS

1. At all relevant times, plaintiff Janice Lee was and still is a resident and domiciliary of New Jersey residing at 286 Shaler Blvd., Ridgefield, New Jersey.

2. Plaintiff Bon Hyub Koo is the husband of plaintiff Janice Lee who was and still is resident and domiciliary of New Jersey residing at 286 Shaler Blvd., Ridgefield, New Jersey. Plaintiff Bon Hyub Koo suffers from loss of consortium and humiliation among others by the acts and/or omission of the Defendants.

3. Plaintiff Ryan Jun-mo Koo is a minor son of plaintiff Janice Lee who was and still is resident and domiciliary of New Jersey residing at 286 Shaler Blvd., Ridgefield, New Jersey. Plaintiff Ryan Jun-mo Koo suffers from loss of consortium and humiliation among others by the acts and/or omission of the Defendants.

4. Plaintiff Hong Sea Lee is the father of plaintiff Janice Lee who was and still is resident and domiciliary of New Jersey residing at 286 Shaler Blvd., Ridgefield, New Jersey. Plaintiff Hong Sea Lee suffers from loss of consortium and humiliation among others by the acts and/or omission of the Defendants.

5. Plaintiff Yoon Soon Lee is the mother of Plaintiff Janice Lee who was and still is resident and domiciliary of New Jersey residing at 286 Shaler Blvd.,

Ridgefield, New Jersey. Plaintiff Yoon Soon Lee suffers from loss of consortium and humiliation among others by the acts and/or omission of the Defendants.

JURISDICTION AND VENUE

6. This Court has jurisdiction over this matter under 28 U.S.C. §1332 as the amount in controversy between plaintiffs and each defendant exceeds \$75,000.00 exclusive of costs and interest. Venue is proper in this district because significant event arose here including plaintiff Janice Lee's wrongful arrest, incarceration, and injuries of all plaintiffs, due to tortious acts being suffered here.

GENERAL ALLEGATIONS

7. At the relevant times, Janice H. Lee was the mother of an 8 year old son Ryan Jun-mo Koo and wife of Bon Hyub Koo, who all reside with both of her aging parents Hong Sea Lee and Yoon Soon Lee at 286 Shaler Blvd., Ridgefield, New Jersey. Mrs. Lee is a sales account manager for an international seller of wigs and hair products, and has been managing New Jersey accounts and other customers. Plaintiff Janice Lee is an individual of high moral character, completely reputable and honorable, with deep roots in the Korean-American community, a model citizen, never touched illegal drugs and has never engaged in prostitution or the operation of a prostitution ring.

8. Under the guise of news reporting, defendants reported a false story

advanced by officials from the State and City of New York and State of New Jersey without fact-checking, without investigation, without interviewing those involved, and with no regard for accuracy.

9. In defendants' purported "news," defendants reported in essence that plaintiff Janice Lee was a drug dealer; prostitute; organized gang member; and part of a Superbowl drug/prostitution rings that operated systematically during the 2014 Superbowl season.

10. Defendants' articles were wholly and partially materially false. The false statements were statements of fact and not mere opinion or puffery. The statements told defendants' audience that Mrs. Lee is a whore; that she is a drug dealer; that she is part of a gang. Each of these factual statements are defamation per se; the combination of all such factual statements are abject bad faith defamation per se. Defendants' false report has placed plaintiffs in a false, sleazy, criminal light and has harmed their good name and reputation within the Korean-American community and the community at large.

11. Due to each defendant's acts, Janice Lee's immediate family members have been humiliated and otherwise injured along with her. They lived through the experience of having their mother, wife, daughter taken in handcuffs or shackles; locked up and treated like a convicted criminal for a substantial time; and humiliated

among millions of readers and all of her community as a criminal; as a prostitute; as a gang member and as part of an organized criminal enterprise.

12. Defendants' conducts were so far below the standard of practice which governs the news media, according to long established principles in the news reporting profession. Among these, the American Society of Newspaper Editors (ASNE) <http://www.asne.org/kiosk/archive/principl.htm>, states, among other things:

ARTICLE IV - Truth and Accuracy. Good faith with the reader is the foundation of good journalism. Every effort must be made to assure that the news content is accurate, free from bias and in context, and that all sides are presented fairly. Editorials, analytical articles and commentary should be held to the same standards of accuracy with respect to facts as news reports. Significant errors of fact, as well as errors of omission, should be corrected promptly and prominently.

ARTICLE V - Impartiality. To be impartial does not require the press to be unquestioning or to refrain from editorial expression. Sound practice, however, demands a clear distinction for the reader between news reports and opinion. Articles that contain opinion or personal interpretation should be clearly identified.

ARTICLE VI - Fair Play. Journalists should respect the rights of people involved in the news, observe the common standards of decency and stand accountable to the public for the fairness and accuracy of their news reports. Persons publicly accused should be given the earliest opportunity to respond. Pledges of confidentiality to news sources must be honored at all costs, and therefore should not be given lightly. Unless there is clear and pressing need to maintain

confidences, sources of information should be identified.

13. As amended in 1986, the International Federation of Journalist (IFJ) <http://www.ifj.org/en/>, the world's longest running journalism organization, organized in 1954 as the World Congress of International Federation of Journalists, provides the following principles, among others:

This International Declaration is proclaimed as a standard of professional conduct for journalists engaged in gathering, transmitting, disseminating and commenting on news and information in describing events.

1. Respect for truth and for the right of the public to truth is the first duty of the journalist
2. In pursuance of this duty, the journalist shall at all times defend the principles of freedom in the honest collection and publication of news, and of the right of fair comment and criticism
3. The journalist shall report only in accordance with facts of which he/she knows the origin. The journalist shall not suppress essential information or falsify documents.
4. The journalist shall use only fair methods to obtain news, photographs and documents.
5. The journalist shall do the utmost to rectify any published information which is found to be harmfully inaccurate.

* * *

14. In the context of the underlying "reports," minimal journalistic standards

were not applied as defendants engaged in abject failure to interview Mrs. Lee or any other suspect; failed to review documents; failed to communicate with Mrs. Lee's counsel, and other factors. Because of their gross, abject, malicious, bad faith failure, defendants are subject to punitive damages.

15. Each defendant committed the journalistic standards by committing the following acts of libel per se.

TMZ PRODUCTIONS INC.

16. Defendant TMZ Productions Inc., d/b/a TMZ.com is a media company “controlled and operated by Warner Bros. Entertainment Inc., located at 4000 Warner Blvd., Burbank, CA 91522 (“Warner”),” as stated on its website <http://www.tmz.com/terms/>. TMZ is primarily a celebrity gossip news source that disseminates salacious and sensational “news” pieces rather than traditional news reporting as such. TMZ.com has 1,537,653 visits and 2,344,402 web page viewings per day in U.S. alone. (See Exhibit 1).

17. Defendants Jane Does and John Does 1-3 are employed by TMZ as a featured columnists/reporters of the website TMZ.com and are believed to be primarily responsible for the contents of the defamatory materials on TMZ's website.

18. On January 30, 2014, defendants published and disseminated “news” story with a headline stating “Super Bowl Prostitution Bust Was Asian Invasion” on its

w e b s i t e

<http://www.tmz.com/2014/01/30/super-bowl-prostitution-ring-cocaine-bust-arrest/>

, (S e e E x h i b i t 2) F a c e b o o k s i t e

<https://www.facebook.com/TMZ/posts/10104153500428720> (See Exhibit 3), Twitter

site <https://twitter.com/TMZ/status/428952513828515841> (See Exhibit 4) and

Google plus site <https://plus.google.com/+TMZ/posts/ZLJNQ81LvMG>. (See Exhibit

5). The manufactured story falsely and outrageously reported plaintiff as a (A)

prostitute; (B) drug dealer and (C) member of an organized criminal gang; and that

she was part of a Superbowl drug/prostitution ring that operated systematically during

the 2014 Superbowl season. Specifically, in the online article (See Exhibit 2),

defendants published the following:

A. "The high-end, coke-fueled prostitution ring that was just busted on the high heels of Super Bowl weekend was comprised of a small army of Asian hookers ... who take credit cards."


B. "NY officials say the prostitutes had their eyes set on Seahawks and Broncos fans who were coming in for the game."

C. "Officials say the ring made millions, with the help of pimps who fronted phony businesses to funnel the sex profits. The businesses included wig shops, a beauty supply store and a limo company."

D. “Johns were paying up to \$10K a night for hookers and blow. The customers would do drugs and become impaired ... and the girls would then figure out ways of fleecing them by charging even more.”

E. “All of the women nailed -- in what NYPD calls Operation Shade of Beige -- are Asian, and used Korean code words to mask the drug deal. One code name for coke -- Soojaebi ... a Korean noodle and vegetable soup. Mmmm Mmmm bad.”

The screenshot shows the TMZ Sports website interface. At the top is the 'TMZ SPORTS' logo with a green background. Below the logo is a navigation bar with links for CELEBS, VIDEOS, PHOTOS, TMZ SPORTS, TMZ TV, STORE, and TMZ TOURS. A search bar is located on the right side of the navigation bar. Below the navigation bar is a row of featured articles with small thumbnail images and headlines. The main article headline reads 'SUPER BOWL PROSTITUTION BUST WAS ASIAN INVASION' with a sub-headline '1/30/2014 9:50 AM PST BY TMZ STAFF'. Below the headline is a large image of a poster titled 'OPERATION: SHADE OF BEIGE' which lists various groups and individuals involved in the bust, including 'BUTTERFLY GROUP PROPRIETOR', 'GOLD VIP GROUP PROPRIETOR', 'JACKIE GROUP PROPRIETOR', 'NARCOTICS SUPPLIERS', 'MANAGER/BOOKER', and 'BUTTERFLY ESCORTS/DRUG DEALERS'. To the right of the main article is an advertisement for Applebee's Bar & Grill, followed by an advertisement for Yoplait yogurt, and a 'PHOTO GALLERY' section for Roc Nation Sports Members.



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"Big Bang Theory" — Carol Ann Susi ... Voice of "Howard's Mom" Dies




Chelsea Handler — Ass Shot ... Take That, Kim K!



Amanda Bynes — Neck Tattoo Snafu



Daniel Tosh Blasts ESPN — You "Hacks" Stole My Trademark Bit




Disney Teenage ... And All Lousy \$5

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Super Bowl Prostitution Bust Was Asian Invasion



0:32 The high-end, coke-fueled prostitution ring that was just busted on the high heels of Super Bowl weekend was comprised of a small army of Asian hookers ... who take credit cards.



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TMZ

TMZ

January 30 ·

NY officials say the prostitutes had their eyes set on Seahawks and Broncos fans who were coming in for the game.



Super Bowl Prostitution Bust Was Asian Invasion

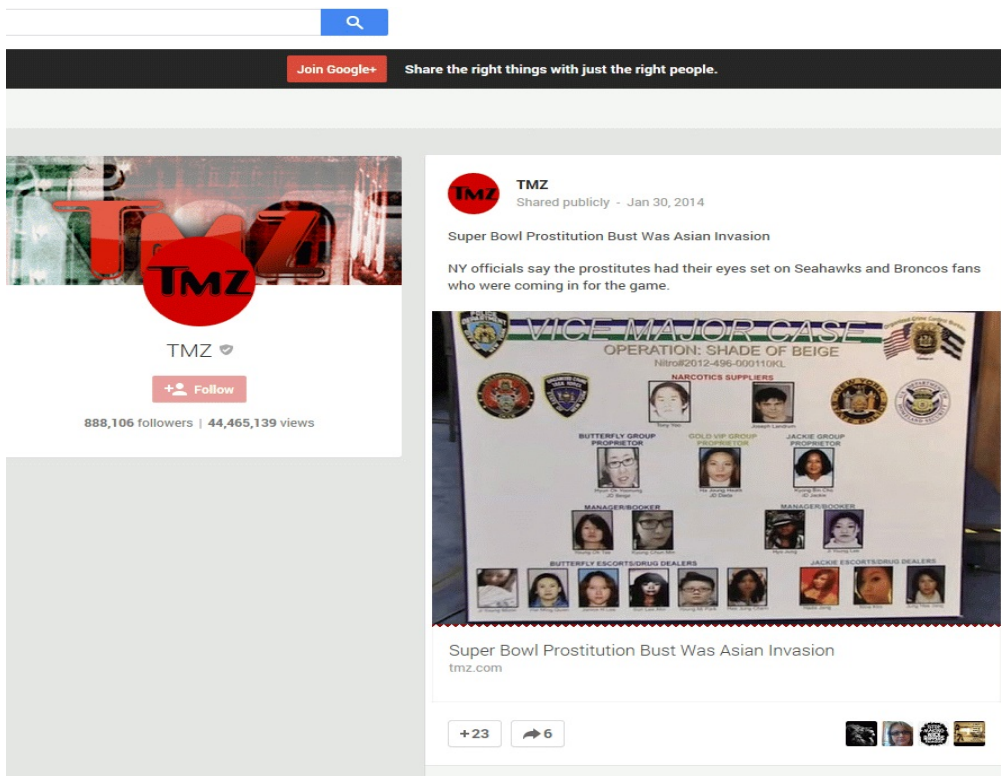
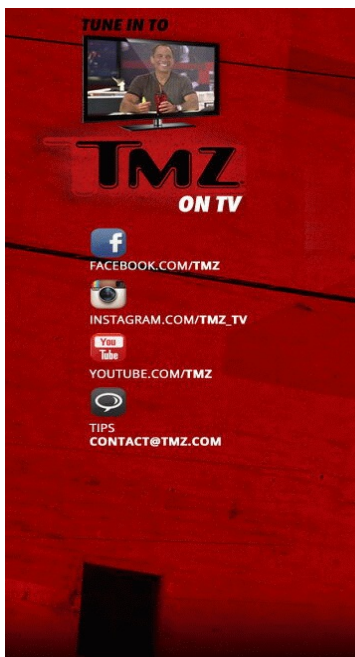
The high-end, coke-fueled prostitution ring that was just busted on the high heels of Super Bowl weekend was comprised of a small army of Asian hookers...

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19. TMZ defendants publication of plaintiff's picture and remarks have caused plaintiff Mrs. Lee considerable mental and emotional distress. As the other plaintiffs came to see such materials on the Internet and told about it by third-parties, the other plaintiffs have suffered emotional distress, humiliation, and anxiety.

21. Because of defendants' defamation of plaintiff Janice Lee has been disseminated to the public, with Mrs. Lee's photograph and her actual name spread across the Internet as a drug dealer, prostitute, and gang member, plaintiffs Mrs. Lee and her family have been smeared in the public light.

22. Because of defendants' acts, plaintiffs have been injured.

DAILY NEWS

22. Defendant Daily News, L.P., d/b/a nydailynews.com (NY Daily News) is a newspaper and internet website company with its headquarters located at 4 New York Plaza, 6th Floor, New York, NY. NY Daily News is primarily a celebrity gossip news source that disseminates salacious and sensational "news" pieces rather than traditional news reporting as such. NY Daily News is believed to be the fourth most widely circulated daily newspaper in the United States, with 1,424,329 visit per day and 3,546,700 web page viewing per day in U.S. alone. (See Exhibit 6)

23. Defendant Joseph Stepansky is believed to be a citizen and domiciliary of the State of New York and is believed to be employed by NY Daily News as a

featured columnist of the newspaper NY Daily News.

24. Defendant Erik Badia is believed to be a citizen and domiciliary of the State of New York and is believed to be employed by NY Daily News as a featured columnist of the newspaper NY Daily News.

25. Defendant Corky Siemaszko is believed to be a citizen and domiciliary of the State of New York and is believed to be employed by NY Daily News as a featured columnist of the newspaper NY Daily News.

26. Defendant David Handschu is believed to be a citizen and domiciliary of the State of New York and is believed to be employed by NY Daily News as a featured columnist of the newspaper NY Daily News.

27. On January 30, 2014, defendants published and disseminated “news” story with a headline stating “One - stop shopping ‘drug and prostitution ring, Asian Wave Escorts, busted ahead of Super Bowl” on its website <http://www.nydailynews.com/new-york/nyc-crime/bust-takes-operators-multimillion-dollar-drug-prostitution-ring-article-1.1596332>. The manufactured story falsely and outrageously reported plaintiff as a (A) prostitute; (B) drug dealer and (C) member of an organized criminal gang; and that she was part of a Superbowl drug/prostitution ring that operated systematically during the 2014 Superbowl season. Specifically, in the online article (See Exhibit 7), defendants published the following:

A. “The prostitutes identified in court papers were no spring chickens. They ranged in age from 26 to 56 and four of them were in their 40s.”

B. “The ring specialized in ‘party-packs’, where johns were enticed to buy cocaine and other drugs to go along with the sex.”

C. “The arrested prostitutes were identified as: Young Mi Lee, 40, Jung Hee Jang, 43, Haiming Quan, 41, Nina Kim, 31, Hada Jang, 26, He Jung Chern, 42, Ji Young Moon, 40, and Janice Lee, 40.”

29. Because of defendants’ defamation of plaintiff Janice Lee has been disseminated to the public, with Mrs. Lee’s actual name spread across the Internet as a drug dealer, prostitute, and gang member, plaintiffs Mrs. Lee and her family have been smeared in the public light.

30. Because of defendants’ acts, plaintiffs have been injured.

SHOWBIZ DAILY

31. Defendant Showbiz Daily d/b/a showbizdaily.net is an internet website with its address at 14747 N. Northsight Blvd., Suite 111, Scottsdale, Arizona. Defendant Showbiz Daily is primarily a celebrity gossip news source that disseminates salacious and sensational “news” pieces rather than traditional news reporting as such.

32. Defendants Jane Does and John Does 4-6 are unknown individuals who are believed to have been employed by Showbiz Daily writers/reporters responsible for

the contents of that article published on January 30, 2014, titled “ High-end drug and prostitution rings busted on super Bowl!!”.

33. On January 30, 2014, defendants published and disseminated “news” story with a headline stating “High - end drug and prostitution ring busted on Super B o w l ! ! ” o n i t s w e b s i t e <http://showbizdaily.net/9838/high-end-drug-and-prostitution-ring-busted-on-super-bowl/>. The manufactured story falsely and outrageously reported plaintiff as a (A) prostitute; (B) drug dealer and (C) member of an organized criminal gang; and that she was part of a Superbowl drug/prostitution ring that operated systematically during the 2014 Superbowl season. Specifically, in an online article (See Exhibit 8), defendants published the following:

A. “A ruthless Manhattan-based prostitution ring that offered “one-stop shopping” for both drugs and debauchery was sacked just days before the Super Bowl.”

B. “The ringleaders and prostitutes were rounded up in overnight raids across the city as they were ramping-up efforts to tap the wallets of out-of-towners heading here for Sunday’s big game.”

C. “They had also just started sending text-message come-ons to regular customers announcing that “new sexy & beautiful girls R in town waiting for u.”

D. “One of the tenants in the Sixth Ave. building is The King’s College, a Christian undergraduate university that houses some of its students there — and which had no idea the illegal activity was going on.”

E. “Their specialty was called “party-packs,” which enticed johns to buy drugs along with sex, both of which were delivered by the hookers.”

F. “In some cases, officials said, the greedy ring leaders took advantage of their wasted customers by flooding their rooms with prostitutes and charging them upward of \$10,000 for a single booking.”

G. “Using undercover investigators, Schneiderman’s office infiltrated the ring and used surveillance and detectives who specialize in tracking business records to build their case.”

H. “They soon discovered that the prostitutes were being supplied by a “Butterfly Group” headed by Hyun Ok Yoonung, a “Gold VIP group” lead by Ha Joung Heath, and a “Jackie group,” whose proprietor was identified as Kyong Bin Cho, officials said.”

I. “The drugs were allegedly supplied by Tony Yoo and Joseph Landrum, according to police. And a quartet of alleged hooker bookers handled the dates. They were identified by authorities as Young Ok Tae, Hyo Jung, Ji Young Lee and Kyung Chun Min. Nine alleged prostitutes were also busted. Their names are Young Mi

Park, Jung Hee Jang, Hai Ming Quan, Nina Kim, Hada Jang, He Jung Chern, Ji Young Moon, Janice H. Lee and Sun Lee Ahn.”

K. “All 18 are charged with conspiracy and several “underlying crimes,” including narcotics sales, promoting prostitution and money laundering, the AG’s office said. Schneiderman said the flesh-peddlers used a battery of businesses, including a clothing wholesaler, a wig dealer, a limousine service and a beauty supply wholesaler, to launder the millions in ill-gotten gains.”

35. Because of defendants’ defamation of plaintiff Janice Lee has been disseminated to the public, with Mrs. Lee’s actual name spread across the Internet as a drug dealer, prostitute, and gang member, plaintiffs Mrs. Lee and her family have been smeared in the public light.

36. Because of defendants’ acts, plaintiffs have been injured.

THE KOREA TIMES

37. Defendant The Korea Times d/b/a/ koreatimes.com is a Korean American newspaper company with its headquarters located at 4525 Wilshire Blvd., Los Angeles, CA 90010. The Korea Times is the largest Korean language newspaper in the United States. It has bureaus in Los Angeles, New York, Washington D.C., San Francisco, Chicago, Seattle, Atlanta, Philadelphia, Hawaii, Toronto, and Vancouver.

38. Cheon Ji Hun is a reporter for The Korea Times and is the named author

of the January 30, 2014 article titled "990 Apartments...Korean Community's Secret Exposed - Shocking Korean prostitution ring uncovered, internet advertising, soliciting clients by texting".

39. On January 30, 2014, defendants published and disseminated "news" story with a headline stating, "990 Apartments...Korean Community's Secret Exposed - Shocking Korean prostitution ring uncovered, internet advertising, soliciting clients by texting" on its website <http://www.koreatimes.com/article/836438> and <http://ikoreatimes.com/Article/view.aspx?p=10&aid=3265>. The manufactured story falsely and outrageously reported plaintiff as a (A) prostitute; (B) drug dealer and (C) member of an organized criminal gang.

40. Defendants reported that plaintiff Mrs. Lee was an organized drug dealer, part of a drug gang; that she was a prostitute; and that she was part of a Superbowl drug/prostitution ring that operated systematically during the 2014 Superbowl season. Specifically, in the online article (See Exhibit 9), defendants published the following in essence:

A. There were a lot of criminal organizations before, but none like this one.

B. NY prosecutors bust prostitution ring of 16 shocking the community.

C. Prostitution enterprise organization = the prostitution are of Korean society whose base was at a well-known Manhattan Koreatown neighborhood known as 990

apartments. The crude organization of prostitutes were separated into three groups that had accountability and operational management over each group. The group names were Butterfly Group, Gold VIP club, and Jackie Club- divided according to the service level. Another group of managers would take charge to attract customers mainly over the phone and internet. In addition to Long Island and Manhattan place of business, customers came from Queens and Brooklyn, covering a wide range of geography to attract customers.

D. Drug services were provided as one-stop package service - the organized prostitutes were advocating the highest quality service, including cocaine for the customers. Equipped with luxury amenities, they offered a package of services called 'party' (Party Pack). Also known as one-stop shopping, customers could choose the party pack with the level of prostitution services offered.

E. Text message marketing = services for prostitution were put on ads on internet advertisement sites or the Village Voice, using covert methods to send the messages to potential customers. Once the customer became regular, they would contact customers via phone text messages. This season, the Super Bowl season actually turned out to have been very busy, actively promoting prostitution and drugs by sending bulk text messages to loyal customers."

밴쿠버

한국일보

English News | 캐나다 | 교민 | 본국 | 미국 · 국제

라이프 [Life]

뉴스 [K.News]

E.News

연예/스포츠 [Entertainment]

포토 [Photo]

게시판 [Classified]

뉴스 [K.News]

전체

캐나다

교민

▶ 미주/국제

북미주한인단체

부동산/경제

사설/기고

리얼뉴스

기획/인터뷰

본국

↳ 본국뉴스

↳ 사회/법정

↳ 영어뉴스

칼럼

■ 연재칼럼

↳ ◇아름다운..

↳ ◇표만용..

↳ ◇시사만평

■ 종로칼럼

↳ ◇14'고민수..

↳ ◇14'백문협..

↳ ◇13'이성구..

↳ ◇13'테드조..

↳ ◇13'이동욱..

↳ ◇13'한승탁..

↳ ◇13'표병호..

'990 아파트'...한인사회 공공연한비밀

2014-01-31 오후 3:55 천지훈 기자

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New York, Philadelphia, Charlotte, Atlanta, Detroit, Chicago and Washington D.C.

44. Natali Rivers is a reporter/columnist for Uptown Magazine and posted the article published on January 31, 2014 titled “Superbowl Slam: High -End Sex Ring Busted In NYC”.

45. On January 31, 2014, defendants published and disseminated “news” story with a headline stating “Superbowl Slam: High - End Sex Ring Busted In NYC” on its website <http://uptownmagazine.com/2014/01/superbowl-slam-high-end-sex-ring-busted-nyc/>. The manufactured story falsely and outrageously reported plaintiff as a (A) prostitute; (B) drug dealer and (C) member of an organized criminal gang.

46. Defendants reported that plaintiff Mrs. Lee was an organized drug dealer, part of a drug gang; that she was a prostitute; and that she was part of a Superbowl drug/prostitution ring that operated systematically during the 2014 Superbowl season. Specifically, in an online article published approximately January 2014 (See Exhibit 10), defendants published the following :

A. “Eighteen people are suspected for their involvement in a huge high-end sex ring right before they were set to see huge dividends during Superbowl week in New York City. They were known for their ‘party packs’ which were a combination of prostitutes and cocaine, for which they would sometimes charge upwards of

\$10,000.”

B. “The ring specifically targeted wealthy customers in New York for large events, so the Superbowl would have been a big boon. The group ran numerous ads on the internet and commercials on public access television (how dumb is that?). A text blast went out last week saying ‘new sexy & beautiful girls R in town waiting for u.’”

C. “The girls were mostly from Korea, brought into the United States by ring members.”

Posted by [Natali Rivers](#) on Jan 31, 2014



Eighteen people are suspected for their involvement in a huge high-end **sex ring** right before they were set to see huge dividends during **Superbowl week** in New York City. They were known for their “party packs” which were a combination of prostitutes and cocaine, for which they would sometimes charge upwards of \$10,000.

The bust came after a nearly year-long investigation, according to New York Attorney General



47. Because of defendants' defamation of plaintiff Janice Lee has been disseminated to the public, with Mrs. Lee's photograph and her actual name spread across the Internet as a drug dealer, prostitute, and gang member, plaintiffs Mrs. Lee and her family have been smeared in the public light.

48. Because of defendants' acts, plaintiffs have been injured.

ROLLINGOUT

49. Defendant Rollingout d/b/a/ rollingout.com is an online news and entertainment website targeting mostly African American viewers. Rollingout's address is PO Box 4479, Atlanta, Gerogia.

50. Terry Shropshire is a reporter/columnist for Rollingout and is responsible for the website content published on January 31, 2014 titled "Super Bowl 2014: Pricey prostitutes with 'party packages' busted in New York".

51. On January 31, 2014, defendants published and disseminated "news" story with a headline "Shame On You", stating "Super Bowl 2014: Pricey prostitutes with 'party packages' busted in New York" on its website: <http://rollingout.com/shame-on-you/super-bowl-prostitutes/>. The manufactured story falsely and outrageously reported plaintiff as a (A) prostitute; (B) drug dealer and (C) member of an organized criminal gang.

52. Defendants reported that plaintiff Mrs. Lee was an organized drug dealer,

part of a drug gang; that she was a prostitute; and that she was part of a Superbowl drug/prostitution ring that operated systematically during the 2014 Superbowl season. Specifically, in an online article (See Exhibit 11), defendants published the following:

A. “You know there are a throng of deep-pocketed tourists in New York during Super Bowl week who are seeking some illegal fun with high-end prostitutes. But they will have to go elsewhere for their illicit activities as one major prostitution ring was dealt a severe blow after cops busted a bunch of pricey prostitutes.”

B. ”The prostitutes, 18 in all, were advertising ‘party packs’ to upscale clientele, the attorney general alleges, which included sex and cocaine. They would, according to the reports, get the clients wasted on alcohol and drugs, and then fleece them for more money.”

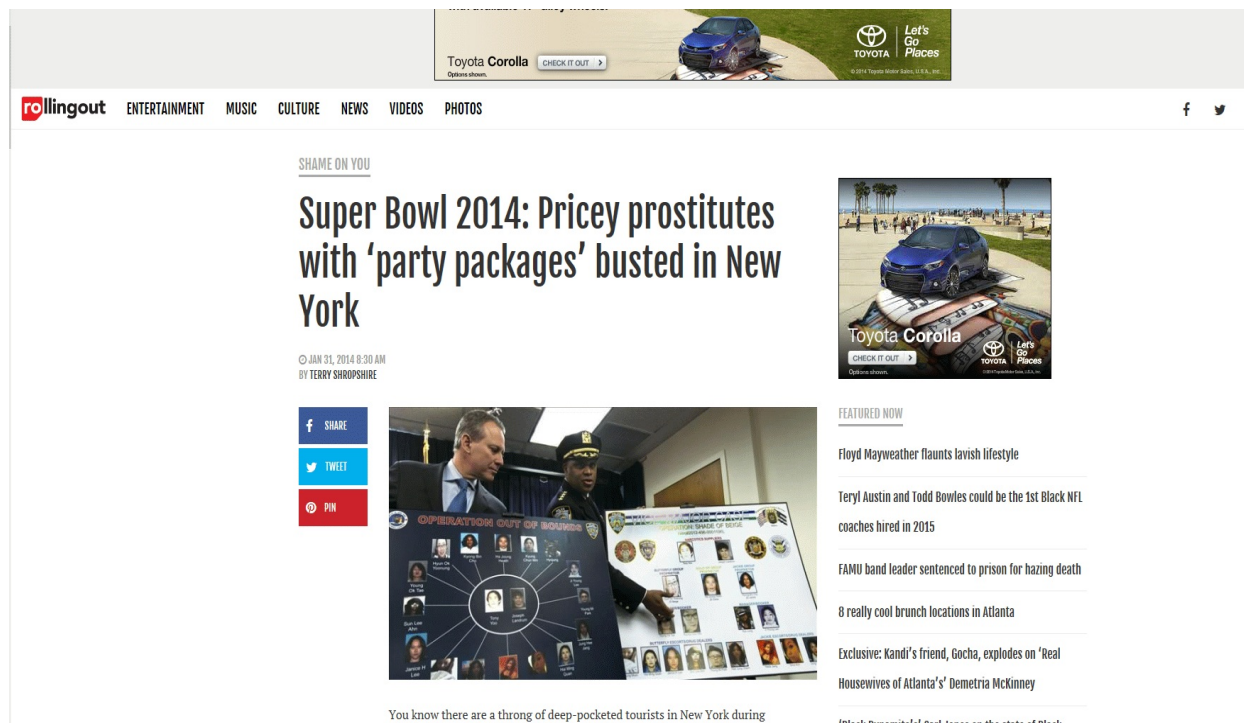
C. “Police said surveillance shows the ring laundered money and credit cards through clothing, wigs, beauty supplies and limousine businesses and targeted wealthy out-of-town customers, especially during large events such as the Super Bowl.”

D. “Prostitutes would bring cocaine to the clients who ordered the so-called ‘party packs.’”

E. “The prostitutes were audacious enough to even advertise on public access TV, making the investigation much easier for the New York authorities. Their

message was enticing for the rich visitors: ‘new sexy & beautiful girls R in town waiting for u.’”

F.”It is unclear if the additional six people arrested were Johns or pimps or people affiliated with this large operation.”



53. Because of defendants’ defamation of plaintiff Janice Lee has been disseminated to the public, with Mrs. Lee’s photograph and her actual name spread across the Internet as a drug dealer, prostitute, and gang member, plaintiffs Mrs. Lee and her family have been smeared in the public light.

54. Because of defendants’ acts, plaintiffs have been injured.

DIRTY SPORTS

55. Defendant Dirtysports d/b/a dirtysports.com is an online news, entertainment and sports website having its address at 221-58 59 Avenue, Oakland Gardens, NY 11364.

56. Defendants John Does and Jane Does 7-9 are employed by Dirty Sports as a featured columnist/writer of the website.

57. On January 31, 2014, defendants published and disseminated “news” story with a headline stating “Super Bowl Drugs & Prostitution Ring Bust in NYC” on its website <http://dirtysports.com/super-bowl-drugs-prostitution-ring-bust-in-nyc/>. The manufactured story falsely and outrageously reported plaintiff as a (A) prostitute; (B) drug dealer and (C) member of an organized criminal gang.

58. Defendants reported that plaintiff Mrs. Lee was an organized drug dealer, part of a drug gang; that she was a prostitute; and that she was part of a Superbowl drug/prostitution ring that operated systematically during the 2014 Superbowl season. Specifically, in the online article (See Exhibit 12), defendants published the following:

A. “Law enforcement officers busted a high end Asian drug & prostitution ring that was banking on clientele visiting NYC for Super Bowl week. The ring was comprised primarily of Korean women and made over \$3 million last year in credit

card sales. This news will surely put a damper on Michael Irvin's weekend festivities."

Super Bowl Drugs & Prostitution Ring Bust in NYC

Posted on **January 31, 2014** by **Dirty Sports**



59. Because of defendants' defamation of plaintiff Janice Lee has been disseminated to the public, with Mrs. Lee's photograph and her actual name spread across the Internet as a drug dealer, prostitute, and gang member, plaintiffs Mrs. Lee and her family have been smeared in the public light.

60. Because of defendants' acts, plaintiffs have been injured.

CHURCH ILBO

61. Defendant Church Ilbo d/b/a/ ChurchIlbo.com is an online newspaper website having an address at 221-58 59 Avenue, Oakland Gardens, NY 11364. Church Ilbo targets mostly Korean American readers and Korean American churches and communities across New York metropolitan area.

62. Defendants John Does and Jane Does 10-12 are employed by Church Ilbo as a featured columnist of the website newspaper Church Ilbo and are responsible for the article titled, "Korean Prostitution Gangs, 16 Koreans Arrested Urgently", published between January 30, 2014 to early February 2014.

63. Approximately between January 30, 2014 to early February 2014, defendants published and disseminated "news" story a headline stating "Korean Prostitution Gang, 16 Koreans Arrested Urgently" on its website http://www.churchus.net/board/view.php?id=MAJOR_PRV&no=1599. The manufactured story falsely and outrageously reported plaintiff as a (A) prostitute; (B) drug dealer and (C) member of an organized criminal gang.

64. Defendants report that plaintiff Mrs. Lee was an organized drug dealer, part of a drug gang; that she was a prostitute; and that she was part of a Superbowl drug/prostitution ring that operated systematically during the 2014 Superbowl season. Specifically, in an online article published approximately between January

30, 2014, to early February 2014 (See Exhibit 13), defendants published the following in essence:

A. Korean prostitution ring was busted by the authorities. They operated from an apartment on 34th street in New York.

B. These criminals used the Super Bowl as the time to advertise for their services and told their clients that new girls were waiting for them.

C. They would also give their clients liquor and cocaine and when the client would lose consciousness, they would use the client's card and charged exorbitant amount.

The screenshot shows the homepage of the Church Daily News website. At the top, there is a header with the site's name '교회일보' and URL 'WWW.CHURCHDAILY.COM'. Below the header, there is a large banner for '선한목자교회' (Good Shepherd Church) with text about a service on December 28th. The main content area features a poster titled 'OPERATION OUT OF BOUNDS' with a central image of a man and a circular arrangement of smaller portraits of other individuals. The names of these individuals are listed around the circle: Hyun Ok Yoonung, Young Ok Tae, Sun Lee Ahn, Janice H Lee, J Young Moon, Hee Jung Chum, Hada Jang, Nina Kim, Ha Ming Quan, Young Mi Park, and Young Lee. To the right of the poster, there is a sidebar with various news links and a search bar. The bottom of the page shows a navigation menu with links to different sections of the website.

65. Because of defendants' defamation of plaintiff Janice Lee has been disseminated to the public, with Mrs. Lee's photograph and her actual name spread across the Internet as a drug dealer, prostitute, and gang member, plaintiffs Mrs. Lee and her family have been smeared in the public light.

66. Because of defendants' acts, plaintiffs have been injured.

ALL THINGS CRIME

67. Defendant All Things Crime d/b/a allthingscrime.com is a blog site that features crime fiction, true crime news, opinion and information. All Things Crime is located at 3302 S. Grand Ave., Los Angeles, California.

68. Defendant BJW Nashe is a writer for All Things Crime who is responsible for the article published on February 6, 2014 titled "Super Bowl Shocker: Interstate Child Prostitution Ring Busted in Connection to Big Game".

69. In a purported "news" story published and disseminated on February 6, 2014, defendants reported that plaintiff Mrs. Lee was an organized drug dealer, part of a drug gang; that she was a juvenile prostitute who was kidnapped; and that she was part of a Superbowl drug/prostitution ring that operated systematically during the 2014 Superbowl season. Specifically, in the online article (See Exhibit 14), defendants published the following:

A. "Only now, days later, has a particular news story related to the Super Bowl

provided some dreadful clarity. The essence of the big game has now been captured and brought into plain view. The headline says it all: “Super Bowl Prostitution Ring Forced Teens as Young as 13 into Sex Work.”

B. “Obviously, kidnapping juveniles and forcing them into prostitution is a shocking and despicable crime. But should we really be surprised that such crimes are part of the equation on Super Bowl weekend?”

Only now, days later, has a particular news story related to the Super Bowl provided some dreadful clarity. The essence of the big game has now been captured and brought into plain view. The headline says it all: “Super Bowl Prostitution Ring Forced Teens as Young as 13 into Sex Work.”

The Associated Press is reporting that the FBI has rescued sixteen juveniles in the greater New York area who were forced to work as prostitutes in the days leading up to the Super Bowl. They were evidently coerced into servicing clients in high-priced “party pack” deals where drugs and sex are combined under one lump sum. Here are some excerpts from the AP story:



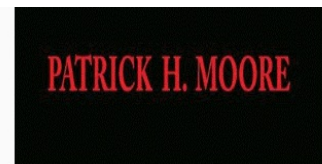
“Officials said the children, some of whom had been reported missing by their families, ranged in age from 13 to 17. Six were found in Newark, N.J., six in New York City and four in New Haven, Conn.

“One of the minors, a 17-year-old girl, had spent the past two years with her pimp, said Michael Osborn, chief of the Violent Crimes Against Children unit at the FBI.

“More than 50 adult women who were forced to work as prostitutes were also rescued. More than 45 pimps were arrested and numerous guns seized, according to investigators.

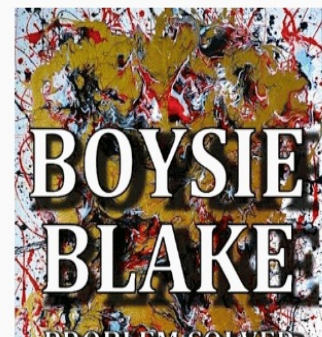
“Some of the victims were from other countries, authorities said.

“Osborn said pimps forced their victims to come to the New York City area from 13 states ahead of the



Cicero's Dead is the intense debut crime thriller from Patrick H. Moore

Click to **LOOK INSIDE!**



70. Because of defendants’ defamation of plaintiff Janice Lee has been disseminated to the public, with Mrs. Lee’s photograph and her actual name spread across the Internet as a drug dealer, prostitute, and gang member, plaintiffs Mrs. Lee

and her family have been smeared in the public light.

71. Because of defendants' acts, plaintiffs have been injured.

KOOGLE TV.COM

72. Defendant Koogle TV .com is an online media and news broadcaster for Korean entertainment shows, movies, music and the news. Defendant KoogleTV.com address is located at 625 S. Berendo, Suite 206, Los Angeles, CA 90005.

73. Defendant D-Bo is a columnist/writer for Koogle. tv and is responsible for the article titled “ Major Underground Drug and Prostitution Ring Arrested in Koreatown, New York” dated February 3, 2014.

74. On February 3, 2014, “Defendants published and disseminated “news” story with a headline stating “Major Underground Drug And Prostitution Ring Arrested In Koreatown, New York” on its website <http://koogle.tv/media/news/major-underground-drug-and-prostitution-ring-arrested-in-koreatown-new-york/>. The manufactured story falsely and outrageously reported plaintiff as a (A) prostitute; (B) drug dealer and (C) member of an organized criminal gang.

75. Defendants reported that plaintiff Mrs. Lee was an organized drug dealer, part of a drug gang; that she was a prostitute; and that she was part of a Superbowl drug/prostitution ring that operated systematically during the 2014 Superbowl season.

Specifically, in the online article (See Exhibit 15), defendants published the following:

A. “There has been a major arrest in New York’s Koreatown this past Thursday. Police raided and successfully arrested a total of 18 people, ranging from suspected pimps to prostitutes, and even drug dealers. Out of the 18 arrested, 16 happen to be Korean.”

B.”This group of people is accused of running ‘party packs’, which include a number of prostitutes and drugs sold to clients for a number of events. The group was looking forward to huge profits from this year’s Super Bowl, but was not able to make it that far due to the raid.”

C. “They also have a store-front business that specializes in cosmetics, wigs, and clothing which they use to launder their profits. The company amounted to over \$3 million USD last year in credit card sales alone.”

76. Because of defendants’ defamation of plaintiff Janice Lee has been disseminated to the public, with Mrs. Lee’s photograph and her actual name spread across the Internet as a drug dealer, prostitute, and gang member, plaintiffs Mrs. Lee and her family have been smeared in the public light.

77. Because of defendants’ acts, plaintiffs have been injured.

78. Defendant Your Daily Media d/b/a/ yourdailymedia.com is an online news and entertainment website having its address at 1550 Bryant St., Suite 470, San Francisco, CA 94103.

80. On January 30, 2014, defendants published and disseminated “news” story with a headline stating “ Police Bust Prostitution Ring Promising Cocain & Hooker

Super Bowl Party Pack” on its website <http://www.yourdailymedia.com/post/police-bust-prostitution-ring-promising-cocaine-ho>. The manufactured story falsely and outrageously reported plaintiff as a (A) prostitute; (B) drug dealer and (C) member of an organized criminal gang.

81. Defendants reported that plaintiff Mrs. Lee was an organized drug dealer, part of a drug gang; that she was a prostitute; and that she was part of a Superbowl drug/prostitution ring that operated systematically during the 2014 Superbowl season. Specifically, in the online article (See Exhibit 16), defendants published the following:

A. “While some people might be upset that their big Sunday filled with whores and opiates is ruined, it's really for the best. And no, not because the hookers apparently steal money from their "Johns" while they are inebriated. Because those would have been just horrible Super Bowl parties.”

B. “Add some hookers and guess what happens?”

C. “Yup! Total hookers-in-the-way-of-the-game party-foul. HOW CAN I WATCH PAYTON MANNING TRY TO THREAD THE NEEDLE AGAINST THE TOP PASSING DEFENSE IN THE LEAGUE WITH ALL THESE HOOKERS IN FRONT OF THE TV? Can some friends just enjoy the #1 teams in both the AFC and NFC face off against each other without having to politely turn down an offer for

sex? And no, you can't wait until halftime. The hookers are probably going to want to watch the halftime show. And lets not forget the cocaine. Are you really going to have a face full of blow after your buddy Dave brings by this?"

D.” I mean, how rude would that be? Your buddy spends all day making an incredible football-themed spread and nobody's hungry because they went balls out on some yayo? Terrible. So thank you, New York Attorney General Eric Schneiderman. You just saved a lot of guacamole from going to waste.”

By MaMo

Police Bust Prostitution Ring Promising Cocaine & Hooker Super Bowl Party Pack

Like **Share** 30 people like this. Be the first of your friends.

New York police have busted a prostitution ring that was promising "Party Packs", which included cocaine and hookers, ahead of this week's Super Bowl. This is great news, as many Super Bowl parties were likely saved.



RECOMMENDED POSTS



82. Because of defendants' defamation of plaintiff Janice Lee has been

disseminated to the public, with Mrs. Lee's photograph and her actual name spread across the Internet as a drug dealer, prostitute, and gang member, plaintiffs Mrs. Lee and her family have been smeared in the public light.

83. Because of defendants' acts, plaintiffs have been injured.

TIGER DROPPINGS

84. Defendant Tigerdroppings d/b/a Tigerdroppings.com is social blogging post located at 14000 Quail Springs parkway, Suite 230, Oklahoma City, OK.

85. Defendants John Does and Jane Does 13-15 are bloggers/writers/columnists who are responsible for the posting on tigerdroppings.com on January 30, 2014 titled, "Super Bowl sex/drug bust - Me so Horny". The article was vile and derogatory to Asian speaking persons.

86. On January 30, 2014, defendants published and disseminated news story with a "Super Bowl sex/drug bust- Me so Horny" on its website <http://www.tigerdroppings.com/rant/p/47972131/superbowl-sex-drug-bust--me-so-horny/>. The manufactured story falsely and outrageously reported plaintiff as a (A) prostitute; (B) drug dealer and (C) member of an organized criminal gang.

87. Defendants reported that plaintiff Mrs. Lee was an organized drug dealer, part of a drug gang; that she was a prostitute; and that she was part of a Superbowl drug/prostitution ring that was operate systematically during the 2014 Superbowl

season. Specifically, in the online article (See Exhibit 17), defendants published the following:

A.” Police have rounded up 18 operators of a prostitution ring being run in New York City because they were selling 'party packs' of cocaine and sex to high-end clients ahead of the Super Bowl.”

B. “Surveillance shows the ring laundered money and credit cards through clothing, wig, beauty supply and limousine businesses and targeted wealthy out-of-town customers, especially during large events.”

C. “Prostitutes would bring cocaine to clients who ordered the so-called party packs.”

88. This defendant’s acts were particularly disgusting and vile because it purported to compare plaintiff Janice Lee’s photo to the Elephant Man’s depiction. Thus defendant went out of its way to smear plaintiff Janice Lee in a most vicious way.

89. Because of defendants’ defamation of plaintiff Janice Lee has been disseminated to the public, with Mrs. Lee’s photograph and her actual name spread across the Internet as a drug dealer, prostitute, and gang member, plaintiffs Mrs. Lee and her family have been smeared in the public light.



90. Because of defendants' acts, plaintiffs have been injured.

CLAIMS FOR RELIEF

Count One — Libel

91. Plaintiffs incorporate the foregoing allegations by reference.

92. By reason thereof, defendants and each of them committed libel with each false article published about the plaintiff Janice Lee. Plaintiffs have sustained significant injury.

Count Two — Libel Per Se

93. Plaintiffs incorporate the foregoing allegations by reference.

94. By reason thereof, defendants and each of them committed libel per se with each false article published about the plaintiff Janice Lee. Plaintiffs have sustained significant injury.

Count Three — Negligent, Reckless & Intentional

Infliction of Emotional Distress

95. Plaintiffs incorporate the foregoing allegations by reference.

96. Defendants acted negligently, recklessly, or intentionally in publishing the false and defamatory story of Mrs. Lee and thereby caused emotional distress against her and her immediate family members, all of the plaintiffs. Defendants were under a duty to fact-check and report accurate facts and do to so by remaining objective and not merely validating and rubber-stamping the bald, false allegations uttered by police and other government officials. Defendants breached this duty knowingly, intentionally, negligently or recklessly, and caused each plaintiff foreseeable harm.

WHEREFORE, plaintiffs demand:

- A. Compensatory damages in the amount to be determined by a jury;
- B. Punitive damages in an amount to be determined by a jury;
- C. Fees and costs of this action;
- D. Injunction requiring defendants to collect and delete the defamatory postings, and replace them with clarification and retractions;

E. Any other relief this Court deems just and proper.

JURY DEMAND

Plaintiffs request a trial by jury pursuant to Federal Civil Rule 38.

Dated: January 12, 2015

/s/ Michael S. Kimm
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